

**An Empirical Analysis of the Potential for  
Market Power in California's Electricity Industry**

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## Executive Summary

In this report, we use a market simulation approach to examine the potential for market power in a restructured California electricity market. Previous attempts to estimate the degree of market power that will exist in this market have relied on concentration measures. Among other shortcomings, concentration measures fail to account for demand or supply elasticities of producers. They are a rough approximation that are best used only when better data are not available. In this case, better data are available.

We use historical data on plant costs and capacities to simulate a deregulated market for electricity in California following restructuring. The simulation recognizes that large firms might have an incentive to restrict output in order to raise price and enables us to explicitly analyze each firm's incentive to do so. The model does not, however, directly incorporate dynamic effects, such as entry and exit, or the ability of firms to tacitly collude when they interact repeatedly. Explicit inclusion of these effects would make the model much more complex and the analysis much more speculative. While it is important to recognize the limits of a static competitive model such as ours, this approach still provides useful insight into the workings of markets and the factors that may have the greatest influence on the exercise of market power.

Our model indicates that, under the current structure of generation ownership, there is potential for significant market power in high demand hours. The most severe problems arise in the fall and early winter months when hydroelectric output is at its lowest level relative to demand in both California and the Pacific Northwest. In these months, even though there is virtually no congestion on transmission paths into California from the Pacific Northwest, there is very little competitive generation in the Northwest that is not allocated to serving its native loads. Therefore, the Northwest has little impact on reducing market power in California during these periods, even though these markets are "merged" in the sense that prices in these markets, adjusting for transmission costs, should be the same.

The low levels of hydroelectric production in these months leaves northern California vulnerable to the effects of congestion over Path 15, the primary north-south market division within California. In many hours of September and December, a dominant firm in northern California could profit from reducing output more than would be the case if there were no constraints along Path 15. In these hours, the available capacities of competitive fringe firms, both inside and outside of northern California, are too small relative to the total demand to effectively discipline a large firm that attempts to raise price. Thus, if demand elasticity is very low, such a firm can drive the price up substantially without losing a large proportion of its sales.

Our results indicate that two of the most important factors in determining the extent and severity of market power are the levels of available hydroelectric production and the elasticity of demand. In fact, these factors have a greater impact on equilibrium prices than the proposed divestitures of California's largest producers. The equilibrium price during the peak hour of September is cut in half when PG&E divests half of its gas units to one firm and SCE divests all of its gas units to two firms (assuming average hydroelectric availability). However, when demand elasticity is increased from the current short-run estimates, 0.1, to a greater but still fairly inelastic level of 0.4, the peak price in this hour is *one-tenth* its original price, even with PG&E and SCE retaining ownership of all their current units.

The impact of increased elasticity on the potentially isolated market of northern California is equally striking. Not only do prices fall very significantly in northern California when demand elasticity is increased from 0.1 to 0.4, the hours in which PG&E might want to induce congestion along Path 15, thereby creating an isolated northern California market, are also greatly reduced.

It is important for policy makers to recognize that elasticities of both supply and demand are not completely exogenous factors. For instance, transmission of real-time price information and enhancing the availability of technology that allows consumers to respond to such information could increase the elasticities of demand. Our results indicate that policies that promote the responsiveness of both consumers and producers of electricity to short-run price fluctuations can have a significant effect on reducing the market power problem. Such policies may be more rewarding, and face less resistance, than remedies that rely on structural changes to the industry or direct intervention in price setting.

Little is currently known about how the patterns of hydro production and electricity consumption will change in response to a deregulated market. While there has been considerable effort directed at developing tools for the optimal scheduling of hydro resources in a regulated environment, the adapting of such methods to a competitive environment is currently an open research question. Similarly, there are many initiatives currently underway to increase price sensitivity of producers and consumers, but the extent of their impact is as yet unknown. Given the impact of these factors on the competition in this industry, further research into these questions seems warranted.

The results of our analysis indicate that there is a significant possibility that some firms will be able to exercise market power at certain hours of the year. While this makes deregulation of generation less attractive than if there were no possibility of market power, this finding should not be seen as suggesting that deregulation is a mistake. Very few markets are completely devoid of market power. One must compare the prices consumers will face in a deregulated market with the outcome under the current regime or some other baseline. While the techniques we employ here could be used to address this questions, it would require a more detail hour-by-hour analysis of this market than we have thus far carried out.

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## 1. Introduction

The foundation for a less-regulated, more competitive electricity industry in California is currently being developed in several different regulatory and industry forums. If the current timetables are met, an electricity spot market will begin accepting bids on January 1, 1998. An initial description of this market has been filed with the Federal Energy Regulatory Commission (see WEPEX, 1996), but several important institutional details and regulatory issues remain. One such regulatory issue is market power. Before the FERC will allow this particular vision of “market-based” pricing of electricity to proceed, it must be satisfied that, among other things, no firm would have the ability to exercise significant horizontal market power in the proposed markets.

California’s electricity industry will be centered around two independent institutions. The Power Exchange (PX) will serve the role of market-maker by accepting supply and, it is hoped, demand bids from the investor owned utilities and others, and then setting half-hourly spot prices (see WEPEX, 1996). The Independent System Operator (ISO) will have the responsibility of ensuring that the dispatch signaled by the PX and by contracts signed outside the PX meet grid reliability criteria. If these dispatches are not considered feasible, the ISO must then ration transmission access in a “non-discriminatory” manner.

Previous analyses have outlined several different product markets that are likely to emerge and remain distinct under this new industry structure (see, for example, Borenstein, et al., 1996a). These products include spot electrical energy, financial and “physical” long-term contracts, and various grid services such as spinning reserve and voltage support. The outlook for market power in these product markets varies. For example, grid service products can be divided into two categories, those whose

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competitive outlook is similar to that of spot energy, and those products, such as voltage support, that could experience significant “locational” market power.

In this paper we focus on markets for electrical energy. We assume that the system rules do not give an advantage to one of the various methods of commercial arrangements, e.g., trade through the PX, futures contracts for electrical energy, or bilateral “physical” contracts.<sup>1</sup> It seems likely that any significant difference in the expected price of energy in one market, such as a price difference between the day-ahead spot market and the price of energy being offered in some longer term contract, would be arbitrated by consumers or marketers that have access to both markets. Thus, for the purposes of this study, we assume that the ability to affect the price of electrical energy depends fundamentally upon the generation capacities and costs of the various potential suppliers.

It is unclear at this time whether generation capacity will be priced as a distinct product in California, as it is in the United Kingdom. It has been argued that if price-responsive demand can set the spot price in capacity constrained hours, efficient capacity investment could be supported by the profit margins provided in these hours. However, recent legislation in California<sup>2</sup> calls for the ISO to operate the grid in a manner consistent with current planning and operating *reserve* criteria. It is as yet unclear how this will affect market incentives for investment in generation capacity.

The same legislation also sets up mechanisms for funding the recovery of the “stranded” investment costs of California’s investor owned utilities, while also specifying an initial 10% reduction in rates intended as a first step towards an eventual 20% reduction. The rates of California’s IOUs for the next five years have therefore been legislatively determined. One effect of this is that these firms will be unlikely to want to exercise market power in the spot market over this period, even if they had the ability to do so. It seems likely therefore that these utilities will price their generation near their short-run marginal cost (but will be paid the legislatively-determined price). Given the many regulatory and legislative distortions of incentives that are likely to dominate during the initial years of this new market, any problems with market power are unlikely to arise until after this initial period. This would be consistent with the experience in the United Kingdom, where a large percentage of the generators’ capacity was initially committed to vesting contracts at set prices. As these contracts began to expire, the dominant position of the two large suppliers began to affect the spot and capacity markets there (Newbery, 1995).

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<sup>1</sup> There is concern that, in their current form, the governing protocols for the ISO and Power Exchange do not satisfactorily achieve the goal of non-discrimination in transmission access (see Stoft, 1997). While an artificial separation of markets such as those for physical power contracts and those for pool-based spot energy are an important line of research, the first step to market power analysis is to determine the potential of firms to affect price in a market that is otherwise efficient.

<sup>2</sup> California Assembly Bill-1890.

We will therefore be concerned with the structural *potential* of certain firms to exercise market power in California. It is important to recognize the distinction between the potential for and the actual realization of market power. Given the initial regulatory framework of this market, this potential is very unlikely to be realized in the first few years after restructuring. This does not eliminate the potential for market power, however; it only shifts it by a few years. Given the high degree of uncertainty and the likelihood of very low spot prices in the near term, it is unlikely that the playing field will shift dramatically during this period – with the important exceptions of the proposed divestitures of generation units by PG&E and SCE and the potential exit of some Qualifying Facilities (QFs).

## **2. Market Power Analysis**

### **2.1 Approaches to Analyzing Market Power**

In the last several years, the topic of market power in electricity markets has received a great deal of attention. This is due largely to restructuring initiatives in the UK and California, as well as the large number of corporate mergers that have been experienced in the US. These studies use three general approaches: concentration analyses, the use of various oligopoly models, and detailed production simulations.

Due to regulatory and legal precedents, almost all analysis to date of electricity industry market power in the United States has utilized concentration indices such as the Hirschman-Herfindahl Index (HHI). This type of analysis has dominated regulatory proceedings over utility mergers (see Frankena and Owen, 1994) and the recent filings to the FERC over the proposed California ISO and PX (Joskow, et al. 1996, Pace, 1996). This approach has some general shortcomings - including poor representation of supply and demand elasticities - that are exacerbated when applied to the electricity industry (see Borenstein, et al., 1996a). Such an approach is frequently the best available option since market shares are often the only readily observable firm data. The regulatory history of this industry, however, has produced an abundance of production cost data, making possible the adaptation of more detailed modeling approaches.

The second major line of research on market power in the electricity industry utilizes oligopoly models that explicitly model the strategic behavior of firms. Most of the recent work on this subject that has appeared in the economics literature has used the “supply-function equilibrium” approach to oligopoly modeling. This approach, first developed by Klemperer and Meyer (1989), was adapted to model the UK electricity market by Bolle (1992), Green and Newbery (1992) and Green (1996). In general terms, these studies use stylized representations of generators costs to develop smooth, continuous cost curves. Players develop optimal continuous bid functions that give output levels for a range of prices. This approach tends to yield several possible equilibria, bounded above by the Cournot outcome. When the capacity of players is constrained, Green and Newbery

(1992) show that the number of possible equilibria is greatly reduced. One notable departure from this approach was that of von der Fehr and Harbord (1993), who argue that the cost functions of suppliers in the UK electricity industry have large discontinuous jumps. They point out that step functions are more representative of generators' costs than the smooth functions necessary for the supply-function approach. They instead model the UK spot market as a sealed-bid, multiple unit auction.

A third line of research has been the adaptation to regional modeling of utility system simulation models that have been used in the past for planning and regulatory purposes (Kahn, et al., 1996, Deb, et al., 1996). These models represent the complexities of utility system operations in great detail, but are not well suited to modeling the strategic behavior of various suppliers. Bidding strategies for an individual firm can be represented by modifying that firm's cost function, but there is no mechanism for finding equilibrium strategies.

In this study we represent the major suppliers as Cournot competitors. We do this to strike a balance between a detailed representation of the costs and incentives of competitors and an explicit, functional representation of the strategies of market participants.<sup>3</sup> The Cournot model can produce, in the words of Schmalensee and Golub (1983), "simulated equilibria that reflect the numbers of rivals and differences among them in a generally plausible way." It is relatively easy to compute these equilibria, allowing for extensive sensitivity analysis. We can therefore use this model to assess the potential impact of various regulatory developments and institutional "fixes" to the market power problem.

Only the largest firms in the market are assumed to follow Cournot strategies. Smaller firms are assumed to be price-takers. For a small firm, price-taking output choices differ very little from Cournot output choices. The actual process of simulating price-taking behavior by smaller firms and Cournot behavior by the largest firms is described in the next section.

In the context of an electricity market, the Cournot model seems an appropriate starting point. The other basic non-cooperative equilibrium concept, the Bertrand equilibrium is supported by the assumption that any firm can capture the entire market by pricing below others and can expand output to meet such demand. Since generation capacities present significant constraints in electricity markets, this assumption is not tenable.

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<sup>3</sup> In a Cournot model, each Cournot firm chooses its profit-maximizing output taking as given the output that will be produced by all other Cournot firms. This is one of the simplest models of strategic firm behavior. Cournot firms recognize the existence of an industry demand function and of output by other firms, unlike price-taking competitive firms which use only market price information to determine their output. A Cournot firm does not, however, attempt to forecast how other firms will change their behavior in response to its own behavior. Underlying the Cournot model is the assumption that a firm will always change its production level if such a change would increase the firm's profits, given the current production of all other Cournot firms.

Previous research suggests that if firms choose their capacities and then compete on price, within the restrictions of their capacity constraints, the outcome may be closely approximated by the Cournot model.<sup>4</sup>

Capacity constraints on generation are significant in both the medium-term – based upon investments in construction of new capacity – and the short-term, in which plants are rendered “unavailable” due to maintenance and other reliability considerations. This latter, short-term, constraint is most relevant to this study, since the capacity investments of the major players have already taken place.<sup>5</sup> In their study of the UK electricity market, Wolak and Patrick (1996) argue that the market power of the dominant firms is manifested through those firms declaring certain plants unavailable to supply in certain periods. Thus, the centralized price mechanism and capacity-constrained suppliers in electricity markets (at least during peak periods) support the use of a Cournot model for a base-case analysis.

While one could model the industry as either perfectly competitive or perfectly collusive, these extreme models are poor representations of the market. Firms may be able to reduce rivalry through repeated interaction, as we discuss below, but antitrust laws and the natural tendency to cheat on collusive agreements make a *perfectly* collusive view of the electricity market hard to credit. Furthermore, modeling the non-economic factors that might support explicit collusion – such as common background, threats to individuals, or technology for monitoring and enforcing such collusion – is beyond the scope of this study and the authors’ expertise. At the opposite extreme, while firms may compete fairly aggressively at times, there are at least a few firms in California that could potentially profitably raise price by restricting output. Thus, a perfectly competitive model of this market, in which no firm recognizes the effect of its marginal production on the price it receives for all of its output, is simply not tenable. Furthermore, it is not possible to analyze the potential for exercise of market power using a model that by assumption does not permit the exercise of market power.

One outcome of our analysis is an estimate of the Lerner index of market power, which measures the markup over the perfectly competitive price. As we see below, the outcomes will depend upon the price elasticity of demand, the capacities and cost curves of Cournot competitors, and the cost curve of the competitive fringe. These are all factors that are not well represented in studies utilizing concentration measures.

## 2.2 Dynamic Considerations in Market Power Analysis

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<sup>4</sup> See Kreps and Sheinkman (1983) and Davidson and Denekere (1986).

<sup>5</sup> There is one other significant short-term capacity constraint, involving the commitment of generation units to a dispatch process. Since most generation units are constrained on how quickly they can begin producing output from a shut down state and how quickly they can increase output to higher levels, generators must commit to certain output capabilities before they actually provide output in a given hour. We discuss the qualitative implications of these constraints on our market power model later in this report.

None of the models that we have discussed thus far incorporates some potentially important dynamic aspects of competition. First, interactions among firms in a market take place repeatedly over time. In a dynamic model of repeated interaction, it is possible that firms will learn over time to compete less aggressively with one another. Also, repeated interaction allows a firm to more credibly threaten to punish a rival who behaves non-cooperatively. Faced with a more credible threat of retaliation, a firm is less likely to compete aggressively. Reduced rivalry between firms would lead to higher prices and lost consumer welfare.

Closely related to the repeated interaction considerations is the issue of sales that take place through forward or futures contracts.<sup>6</sup> Such futures markets allow a seller to precommit to output, thus ensuring it a certain quantity of sales. Even for sales of electricity for delivery at a certain point in time, repeated interactions among firms in selling that product – through many days of advanced sales of the good – can have complex effects on the nature of competition. Theoretical work in economics has shown that such repeated interaction can increase or decrease the level of competition between incumbent firms.<sup>7</sup>

A dynamic model of competition, however, would also take into account the effect of actual or potential new entry into the market and possible exit from the market. The possibility of new entry might prove to have a significant disciplining effect on prices and might offset any increased cooperation among incumbent firms in a dynamic setting. If prices over the year are too low to cover a plant's fixed operations and management costs, the plant might shut down, lessening the number of plants and the intensity of competition.

Unfortunately, economic models of dynamic competition in general do not provide a clear guide to either appropriate empirical modeling or the net effect that these factors are likely to have on prices. Furthermore, the models often yield indeterminate results, such as any price between the perfectly competitive outcome and the perfect collusion outcome being a possible equilibrium. Empirical analysis of the dynamic nature of competition among a fixed set of competitors also is notoriously difficult.<sup>8</sup>

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<sup>6</sup> We use the term futures market to refer to trades that are contracted for prior to delivery. Whether these take place in formal futures markets -- which have standardized contracts and a centralized trading system -- or less formal forward markets -- in which contracts are not standardized -- makes no difference to the argument. Also, whether most such contracts actually result in product deliveries or are settled financially is irrelevant so long as the contract represents an option for physical delivery.

<sup>7</sup> See Allez and Vila (1993) for an example of the former and Ausubel and Deneckere (1987), and Gul (1987) for examples of the latter.

<sup>8</sup> There have been a few attempts to analyze dynamic competition and cooperation (Porter (1983), Ellison (1994), Borenstein and Shepard (1996)), but they have focused on testing very specific aspects of the dynamic models. We are not aware of any work that has applied models of dynamic competition to infer the extent of market power that will be exercised in a market.

Entry and exit considerations could possibly be incorporated into our analysis, but even these effects are difficult to pinpoint with any precision. Analysis of entry depends on making inferences about the costs of production facilities that do not yet exist. While the costs that determine exit from a market exist in theory, in practice this requires difficult and controversial judgments about which costs are truly likely to vary with the operation of a plant. The biggest obstacle to incorporating entry and exit effects into a short-to-medium run analysis is the need to include measures of the speed with which such changes are planned and implemented in response to the market environment.

Our analysis does not capture these dynamic aspects of electricity markets. As such, the results of our analysis are imperfect predictors of the degree of competition that will actually take place. Still, in comparison to simple concentration measures that fail to capture many important aspects of competition that our model does incorporate, or in comparison to theoretical models of dynamic competition that have no clear empirical implementation, the modeling framework that we implement is likely to offer greater insight into the degree of competition that may actually obtain in a deregulated California electricity generation market and how that competition may be affected by changes in plant ownership.

While we do not analyze these dynamic aspects explicitly, it is possible to interpret our results in a way that recognizes some of these considerations. We analyze the market for a range of demand elasticities. Supply elasticity from small firms can be incorporated as part of the demand elasticity. In fact, in some cases (such as co-generation), it is almost arbitrary whether such changes should be incorporated as supply effects or as (net) demand effects. Thus, longer run entry and exit considerations can be approximated by examining more elastic demand functions. This, of course, raises the question of *how much* more elastic the relevant demand curve should be to incorporate these considerations. Unfortunately, this depends on the speed of entry and exit, and the costs of those firms, data that we do not have. Nonetheless, the more-elastic demand functions that we examine – demand elasticities of 0.4 and 1.0 – while not indicative of current final-consumer short-run demand response, may provide a better guide to the true ability of firms to exercise market power in light of the potential entry and exit in the market.<sup>9</sup>

Another dynamic in this market that is more widely recognized, also argues for greater focus on the analyses that assume higher demand elasticity. If prices to final consumers

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<sup>9</sup> Wolfram (1996) finds that the oligopoly models such as that used by Green and Newbery (1992) overstate the degree of market power exercised by the largest firms in the UK. While she states that this may be due to the threat of entry, she also recognizes that the threat of government regulation and government pressure more generally is also a very plausible cause. Also, Wolfram calculates the degree of market power exercised given the capacity that is made available by the firms. If the exercise of market power takes place significantly through capacity availability decisions, as Wolak and Patrick (1996) show is probably the case, then Wolfram's analysis would not capture it.

vary over time, consumers will have greater incentive than they now do to adopt conservation and demand shifting technologies. These technologies have significant up-front costs. Increased usage of these technologies will probably occur gradually as consumers learn more about the operation and pricing of the electricity market.

### 3. Methodology

#### 3.1 Geographic Markets

The relevant geographic market for spot electricity in the absence of transmission constraints is generally considered to encompass the member utilities of the Western Systems Coordinating Council (WSCC), which includes utilities in 16 states, 2 Canadian, and one Mexican province. As a simplification of this broad market we have grouped non-California power producers into three smaller markets, one north of California, one to the east and one to the south (see Table 1). Utilities in these markets are assumed to be either regulated or publicly owned, with a mandate to make serving their native load the top priority. To assess the competitive potential of these out-of-state producers, we construct residual regional supply curves. The cost curves of individual utilities in each region are combined and the native load of the region is netted out from these supply curves. The remaining generation capacity is assumed to be available to sell into the California spot market, subject to transmission constraints. As explained above, out-of-state suppliers are assumed to be price-takers.

#### *Treatment of Transmission Capacity Constraints*

The grouping of out-of-state suppliers into two regional “pools” facilitated the representation of transmission into California as following two major paths, from the Oregon border into both northern and southern California and from Arizona and Nevada into southern California. Initially, we therefore represent the western grid, from the California perspective, as a radial grid with California as a net importing node. Loop flow and other network considerations resulting from the physical nature of electrical flows are not directly modeled.<sup>10</sup>

The thermal capacity ratings of individual lines along these aggregate paths were combined to produce an estimate of the aggregate flow capacity along these two paths. For the Arizona/Nevada to California interface, we used the non-simultaneous flow constraint across the “west-of-river” (WOR) boundary of 9406 MW. This boundary includes all AC lines into southern California from Nevada and Arizona. The Inter-mountain link between Utah and Los Angeles provides another 1920 MW of capacity into southern California from the states represented in our south-eastern fringe. In addition to out-of-state fringe supply from these states, there is considerable generation capacity located in these states that is owned by California utilities, around 5125 MW. This capacity consists of low cost coal and regulatory-influenced nuclear resources. We therefore treat this capacity, after accounting for transmission losses, as if it is located in California and derate the

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<sup>10</sup> See Cardell, Hitt, and Hogan (1996) for a theoretical representation of a Cournot competition in a meshed network using the DC-load approximation to network flows.

boundary link by the corresponding capacity.<sup>11</sup> Therefore, only about 6021 MW of transmission capacity is available for fringe players located in the southwest region after accounting for the inflow of generation owned by California suppliers but located on the other side of the WOR constraint. In addition we examined the impact of the major north-south path constraint in California, the Path 15 constraint.

**Table 1: Definitions of Regional Markets**

Regional Market	States or Utilities Included	Transmission Capacity into California
California	California IOUs, Munis, Water & Irrigation districts, WAPA central valley project	NA
Northwest	British Columbia, Alberta, WA, OR, ID, MT, WY, CO, ND, SD	7870Mw <sup>12</sup>
Southwest	AZ, NM, NV, UT <sup>13</sup>	11326 Mw
Mexico	CFE	408 Mw

### *Treatment of Transmission Line Losses*

When electricity is transmitted over long distances, some amount is dissipated as heat. This becomes a significant factor in a regional model where the transmission is over many hundred miles. In this study, we account for line losses on electricity that is transmitted into California from outside the state. We do this by decreasing the delivered quantities by a loss factor and increasing the cost per Mw by the inverse of one minus the loss factor. The results presented use a loss factors of 5%. We also decrease the *delivered* capacity of the transmission lines by the loss factor.

## **3.2 Suppliers**

Our focus is on the electricity spot market in California. We assume that utilities located in neighboring states, while significant in the aggregate, are not sufficiently large individually to attempt to influence prices in California.<sup>14</sup> We assume that these firms act as price takers in the California market, selling into the California market (after serving

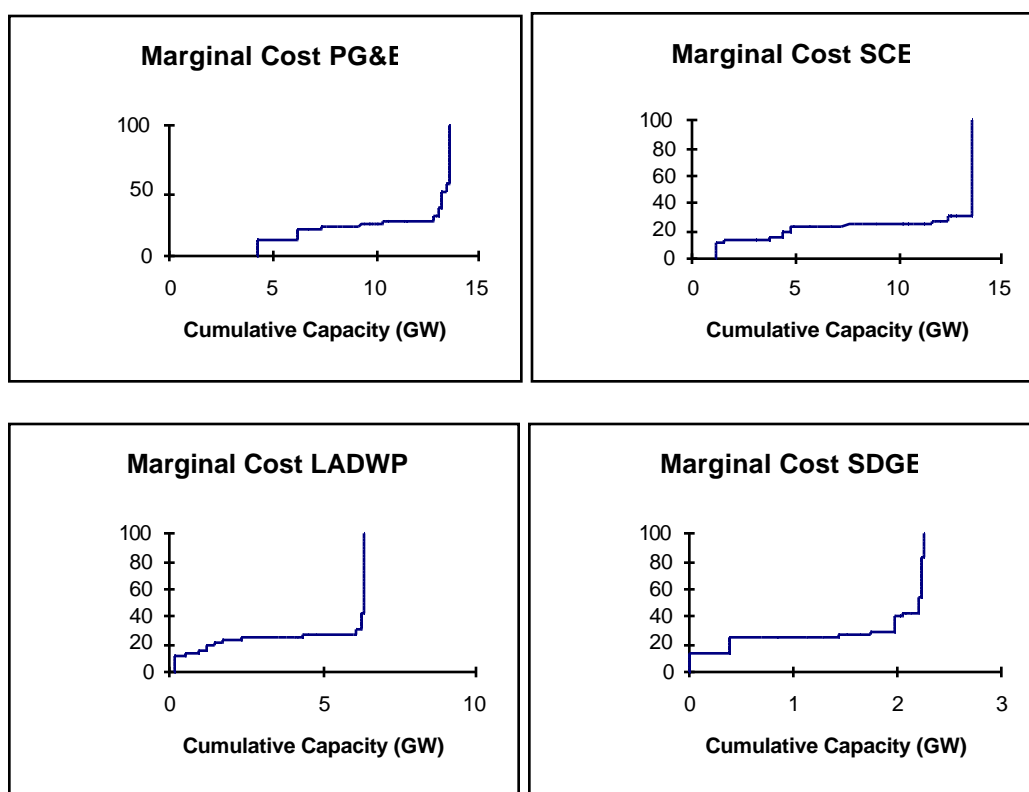
<sup>11</sup> The derating of the line affects the analysis only when it is at or near congestion. At such times, it is reasonable to assume that these low costs plants owned by California firms would be operating at capacity.

<sup>12</sup> The aggregate capacity rating along the northwest to California paths have been temporarily reduced to around 6700 Mw in response to series of outages in the summer of 1996. We do not consider the impact of this reduction in transmission capacity.

<sup>13</sup> The generation capacity of PacifiCorp, whose service area straddles both of our out-of-state regions, was divided into these two areas according to geographic location of each resource.

<sup>14</sup> One potential exception to this assumption is the federally-owned Bonneville Power Administration, which controls an enormous share of the generation capacity – largely hydro-electric – in the Pacific northwest. We discuss the implications of the strategic use of these hydro resources later in this report.

their native load) up to the point that their marginal cost is equal to the price in the market. We make a similar assumption for the many small municipal utilities and irrigation districts within California, whose combined generation capacity is about 10% of the total capacity owned by California utilities and QFs. We represent the three large investor-owned utilities (IOUs) in California – Pacific Gas & Electric (PG&E), Southern California Edison (SCE), and San Diego Gas & Electric (SDG&E) – as Cournot competitors facing a price-taking fringe consisting of both in-state producers and out-of-state electric utilities. The Los Angeles Department of Water and Power (LADWP) also owns a significant amount of California’s generation capacity. LADWP, however, will continue to be a net *purchaser* of electricity, offsetting an interest it might otherwise have in increasing prices.<sup>15</sup> Although LADWP may be a net supplier in many hours, its interest in raising the market price by withholding supply would be directly related to the size of its *net* supply during those hours. We assume LADWP’s net supply is a very small part of the electricity market in all hours. We therefore treat LADWP as a price-taking fringe supplier.



**Figure 1: Production Costs of California Suppliers**

<sup>15</sup> In contrast, the distribution affiliates of the IOUs will continue to be regulated and will most likely be able to pass on electricity purchase costs to their customers.

Using plant heat-rate and operating cost data obtained from the California Energy Commission and other sources (see appendix b), we construct marginal cost functions for each utility in California and the western United States, western Canada, and northern Mexico. The marginal cost functions of the small California producers were combined into a single, in-state fringe supply function.<sup>16</sup> Figures 1 and 2 show the cost-curves of the four largest California suppliers and the fringe suppliers.<sup>17</sup>

### *Treatment of the Price-Taking Competitive Fringe Producers*

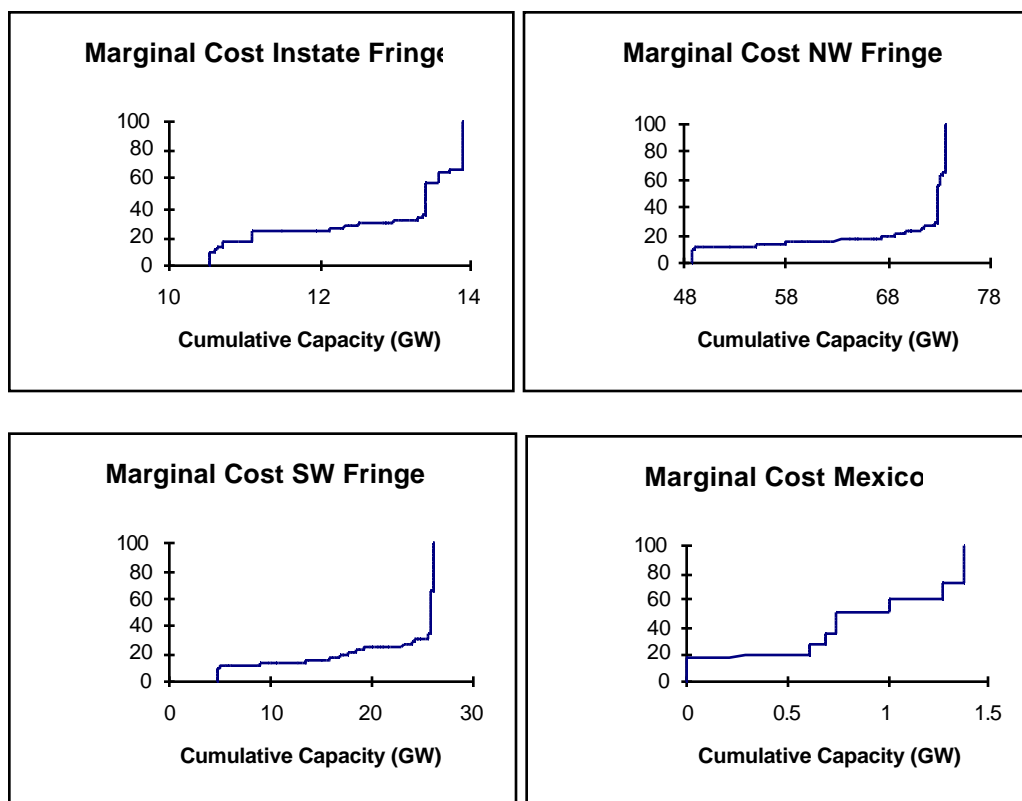
To analyze competition among the Cournot firms in this market, we first control for the effect of price-taking firms (small California producers, LADWP, and the out-of-state fringe) by subtracting the aggregate supply of these fringe firms from the market demand. From this, we obtain a residual demand curve that the Cournot firms in the market would face.<sup>18</sup> To obtain the aggregate fringe supply at any given price, we added together the quantity that each of the price-taking firms would produce if it produced every unit of output for which its marginal cost was less than the price. We then subtracted this quantity from the market demand quantity at that price to obtain the residual demand quantity at that price. The resulting residual demand function is more price elastic than the original market demand function. This is the demand over which the Cournot firms are assumed to compete.

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<sup>16</sup> The analysis assumes that each plant has a constant marginal cost up to capacity. Consideration of non-monotonic marginal cost functions for individual plants would greatly increase the complexity of the simulation and, possibly, lead to non-unique or nonexistent equilibria.

<sup>17</sup> The production capacities shown in figures 1 and 2 reflect the instantaneous output capacities of pondage-hydro resources. Due to water limits, output from these units is often far below the instantaneous capacity. We discuss the treatment of hydro resources below.

<sup>18</sup> See Carlton & Perloff (1994), pp. 157-169, for a presentation of a model with a single large firm and a competitive fringe. Our model uses the same basic structure, but recognizes that there will be more than one firm in the California electricity market that can influence price.



**Figure 2: Production Cost of Price-Taking Fringe Suppliers**

### *Treatment of Nuclear Power Plants*

At the time of this writing, it seems likely that nuclear generation capacity will be treated as a special case in California's electricity market. Current proposals would guarantee a level of capital cost recovery on these units and set an energy price on nuclear output at estimated levels of "going forward" costs, including variable costs and fixed O&M. Facing such an agreement, utilities would either operate their nuclear plants at a high capacity factor in order to recover their fixed operating costs or choose to decommission them.<sup>19</sup> Since, however, decommissioning of nuclear plants would likely threaten any agreements to recover capital costs, we assume for this study that these nuclear units are available as "must-run" and we add their capacity to the competitive fringe.

Treating a plant owned by a Cournot firm as part of the competitive fringe has the effect of taking it out of strategic consideration by the firm. In considering the benefits that it would get from restricting output and raising price, the firm would then not include extra revenue on the output of such a plant. Furthermore, the firm then does not have the ability to restrict the production from that plant in order to raise the price in the market. These factors correspond to the relationship of an IOU in California to a plant that it

<sup>19</sup> We thank Paul Joskow for clarifying this point.

owns, but is classified as regulatory must run: the firm does not have the ability to restrict that plant's output and its compensation for that plant's production is not tied to the market price. Thus, placing an IOU-owned plant in the competitive fringe (with a zero bid) is equivalent to treating it as regulatory must-run.

### *Treatment of Hydroelectric Generation*

As our results will show, the amount of available hydro power in the Pacific Northwest and California plays a large role in determining the extent and severity of market power. The treatment of hydroelectric generation is more complex than any other production technology because there are important intertemporal constraints on production. At many points in time, increasing production from hydro in one period will lower the production that is possible in another period on a one-for-one basis. This raises the question of how hydro would be optimally scheduled. We treat the hydro scheduling problem as if it takes place in a market with no uncertainty. We discuss below how this assumption affects the analysis.

If a producer faced no uncertainty and no constraint on instantaneous hydro production, then it would schedule hydro so as to equalize the marginal profit that it earns from one more unit of electricity production across all times in which the hydro is in use. For example, consider a group of many small price-taking hydro producers of electricity. If the price in time period A were higher than the price in period B, then these producers would have an incentive to move hydro production from B to A, reducing supply during period B and raising supply during A. As the firms did that, however, price during period B would increase and price during A would decline. Only when the prices were equalized, would the incentive to move output from B to A disappear.

For a firm with market power, the incentives are quite similar. In that case, however, the producer would always want to move hydro output to the time period in which its *marginal revenue* was highest, rather than to the period in which the *price* it received was highest. So, if a firm with market power were producing with electricity from hydro in each of two periods, A and B, and if at current production levels its marginal revenue during period A were higher than its marginal revenue during period B, then it could increase its profits by decreasing production during B and shifting that amount of production from hydro to period A. This would raise its total revenue without affecting its total costs and, thus, would increase its profits.

This simple analysis, however, is complicated by two factors. First, this analysis assumes that producers can produce unlimited amounts of electricity from hydro during a given period so long as the aggregate hydro production constraint is not binding. In fact, there are important instantaneous production constraints in production from hydroelectricity generators. If a firm's hydroelectric generators have a maximum instantaneous production of  $K$ , then the firm cannot produce more than  $K$  units of output

from hydro during a period even if the firm's marginal revenue in the period remains higher than in another period in which it is using hydro. Second, almost all hydro systems have *minimum* instantaneous flow constraints related to the ecological needs of the river systems. Thus, if a firm with market power were producing electricity from hydro in each of two periods, A and B, and if at current production levels its marginal revenue during period A were higher than its marginal revenue during period B, then it would transfer hydro production from B to A until (1) the firm's marginal revenues in the two periods were equalized, (2) production in B is at its minimum output level, or (3) the maximum instantaneous hydro production during period A were reached. Table 2 shows the relevant parameters for hydro-electric production that were used in this study. The values for energy produced were primarily derived by taking the average of the energy produced in each of these months over the last four years.

**Table 2: Hydro-electric energy and capacity values**

	March	June	September	December
<b>California Energy Produced* (MWh)</b>	3,834,000	4,335,000	2,342,000	1,715,000
<i>Min Flow(MW)</i>	2,604	2,947	2,947	2,305
<i>Max Flow(MW)</i>	8,674	9,296	9,296	8,680
<b>Southwest Energy Produced*(MW)</b>	963,000	1,132,000	835,000	805,000
<i>Min Flow(MW)</i>	458	529	529	451
<i>Max Flow(MW)</i>	4,696	4,747	4,689	4,689
<b>Northwest Energy Produced** (MW)</b>	16,802,000	18,553,000	11,575,000	16,736,000
<i>Min Flow(MW)</i>	13,506	13,632	13,632	13,422
<i>Max Flow(MW)</i>	48,861	48,718	48,718	48,776

\* Source: Energy Information Administration, *Electric Power Monthly*.

\*\* Source: EIA, *Electric Power Monthly* (US generation) and WSSC Summary of Estimated Loads and Resources Data, January 1, 1996 (Canadian generation).

Although it is relatively straightforward to characterize a Cournot competitor's optimal allocation of hydroelectric energy under certainty, it is much more complicated to solve for these values. We instead use an approximation of the optimal hydro distribution based upon a technique known as "peak-shaving". We allocate the available hydroelectric production in a month across hours of the month by simply allocating hydro to the highest demand periods (subject to minimum and maximum flow constraints), thus "shaving" the peak demand quantities, so that non-hydro production in any period is equalized across all high-demand periods. Quantity is a fairly rough approximation of marginal revenue, however, so our allocation of the hydro resources of Cournot competitors may overstate or understate the output of these suppliers in any given hour.

The second complicating factor is the fact that hydro also is used to respond to unforeseen supply and demand shocks to the system. Hydro is an attractive source for

responding to sudden supply needs because it has low start-up costs and generation can begin with very little delay. As a result, companies that own hydro generation often hold some hydro capacity in reserve for use in responding to unforeseen needs. For these same reasons, hydro resources are also used in mid-level demand hours to avoid committing thermal units. Modeling these considerations even in a perfectly competitive context is extremely complex. Therefore, we have not incorporated the unit-commitment and reserve capacity functions of hydro for capacity into the model. This also implies that our hydro allocation may be somewhat greater in peak hours than it would be in actual use.

### *Treatment of Must-Run Plants*

In their supplementary PX filings to the FERC on market power issues, (Joskow, et al., 1996, Pace, 1996) all three California investor-owned utilities identified several localized voltage-support and contingency constraints that they felt necessitated the operation of specific generation units in order to maintain reliability standards at present levels. Some of these constraints reflected localized market power for reliability services, some reflected the market power in the energy market for sub-regions of California that is induced by transmission constraints within the state. As an interim solution, the utilities have proposed option contracts on the generation of these units that would be held by the ISO and would be called whenever the ISO felt that a unit was needed for reliability service (see Joskow, et al., 1996). The option price would be set using cost-based estimates<sup>20</sup> and function as a price-cap form of incentive regulation when in effect. The utilities also identify several network improvements that would mitigate the need for certain must-run units. The identity and future ownership of these units and the conditions under which they would be considered must-run are still largely unresolved. We therefore do not simulate a specific set of must-run units in this study.

### **3.3 Demand**

We represent the demand for electricity in California with a constant elasticity demand function of the form  $Q = kP^{-\epsilon}$  where  $Q$  is market demand,  $P$  price, and  $\epsilon$  the price-elasticity of demand. We have run simulations for elasticities 0.1, 0.4, and 1.0, a range covering most current estimates of short-run and long-run price elasticity. The constant  $k$  was adjusted to set the demand function through a price-quantity pair taken from the CEC's forecasted average electricity price and demands for the year 2001. This year was selected as a target date for the expiration of many of the regulatory side-payments that will likely distort the production decisions of both large and small producers. The CEC forecasts the average electricity price in the year 2001 to be 9.3¢/kwh. We use an estimate of 4¢/kwh as the cost of local transmission and distribution that would be added onto the

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<sup>20</sup> Among other contentious elements of this plan, there is some dispute over what costs should be included in this option price.

energy price faced by consumers.<sup>21</sup> This figure is in line with the estimates of electric utility sector costs recently undertaken by White (1996). This transmission and distribution cost was added to the marginal costs of all producers in order to align their production costs with the benchmark point of the demand curve.

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<sup>21</sup> While this figure is necessarily a very rough estimate, the results of this study are not very sensitive to its magnitude, since it affects the perceived cost of all competitors equally.

**Table 3: 2001 Forecast Peak Demands (MWs)**

	March	June	September	December
<b>California</b>	38036	49528	54120	41471
<b>N. California</b>	12780	17533	16669	13934
<b>S. California</b>	25256	31995	37451	27537
<b>Northwest</b>	52613	48628	46914	56526
<b>Southwest</b>	15458	19814	19472	16710
<b>Mexico</b>	906	1336	1379	960
<b>WSCC Totals</b>	107012	119306	121885	115667

In addition to satisfying demand, a certain amount of generation capacity will apparently be necessary for satisfying reliability requirements such as spinning reserve. The California restructuring legislation requires that the ISO use standards no less strict than that of the WSCC. There are several criteria that the WSCC applies to spinning reserve (WSCC, 1995), including the requirement that generation capacity up to 5% of demand served by hydro generation and 7% of demand served by non-hydro generation be available as spinning reserve. Since the pool of potential suppliers of spinning reserve is essentially the same as that of energy, we account for these reliability requirements by escalating the demand level for which generation must be supplied by 6% in each of the hours we modeled.

The demand forecasts that we work from are for peak hours in each month. We assume that the shape of the load curve will be approximately the same as it currently is and thus derived expected loads at lower-demand hours. For instance, if the 150th highest load hour in June were currently 70% of the peak demand, we assumed that the 150th highest load hour in June 2001 will be 70% of the June 2001 peak load (for which we have a forecast). This determines a quantity for the “anchor point” for the assumed demand curve in that hour. The price for the “anchor point” was 9.3¢/kwh in all cases. Once an anchor point for the assumed demand curve was established, we constructed a constant-elasticity demand function that included this point and had the assumed elasticity (0.1, 0.4, or 1.0 depending on the run).<sup>22</sup>

In examining the aggregate demand for electricity in the state, we assume that there will be no significant price discrimination between customer classes. In other words, there will be no price differences between classes other than those based on the relative cost of serving each customer class. The likely presence of marketers and other entities who would be

<sup>22</sup> It is worth pointing out a feature of this approach that can otherwise lead to confusion. If two different constant-elasticity demand curves share a common point and one is more price-elastic than the other, then the more-elastic demand curve will *necessarily* lie to the right of the less-elastic demand curve at prices below the anchor point and to the left of the less-elastic demand curve and prices above the anchor point. Thus, at a price above the anchor point, the more-elastic demand curve will be associated with lower demand.

able to arbitrage any artificial price differences between customers and markets would eliminate the ability of suppliers to price discriminate between customer classes.

### *Pre-existing Contractual Arrangements*

We do not include consideration of existing contractual agreements between utilities. If both markets are implemented efficiently, the market for "physical" long-term power contracts and spot energy should not be very distinct from each-other. Relatively extreme prices in one market will prompt adjustments from the other. Most existing purchase agreements between electric utilities are not of the "take-or-pay" variety. Therefore these contracts are not expected to produce the distortions experienced in the natural gas industry.

### **3.4 Cournot Algorithm**

Using the marginal cost functions of the Cournot competitors and a residual demand function, which is the market demand minus the fringe supply at every given price, we calculate the Cournot equilibrium iteratively. We determine the optimal output for each supplier under the assumption that the production of the other Cournot suppliers is fixed. This is repeated for each Cournot firm: the first supplier sets output under the assumption that the other Cournot players will have no output, the second sets output assuming the first will maintain its output at the level that was calculated for it in the previous iteration, and so on. The process repeats, returning to each supplier with each resetting its output levels based upon the most recent output decisions of the others, until no supplier can profit from changing its output levels given the output of the other Cournot suppliers. Thus, at the Cournot equilibrium, each firm is producing its profit-maximizing quantity given the quantities that are being produced by all other Cournot participants in the market.<sup>23</sup>

## **4. Results**

We examine several scenarios representing different assumptions and issues concerning the organization of the electricity market. For most scenarios we calculate the Cournot equilibrium at several load levels for four months of the year, March, June, September and December. These months were selected to account for seasonal variations in available hydro energy, relative regional demand levels, and gas prices. For each month we calculate the Cournot equilibrium price for 6 representative hours including the peak demand hour and the hours with the 150th, 300th, 450th, 600th, and 744th<sup>24</sup> highest demands of the

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<sup>23</sup> For a simple graphical presentation of a Cournot equilibrium and a discussion of the process of iteration to a Cournot equilibrium, see Carlton & Perloff (1994) pp. 233-246.

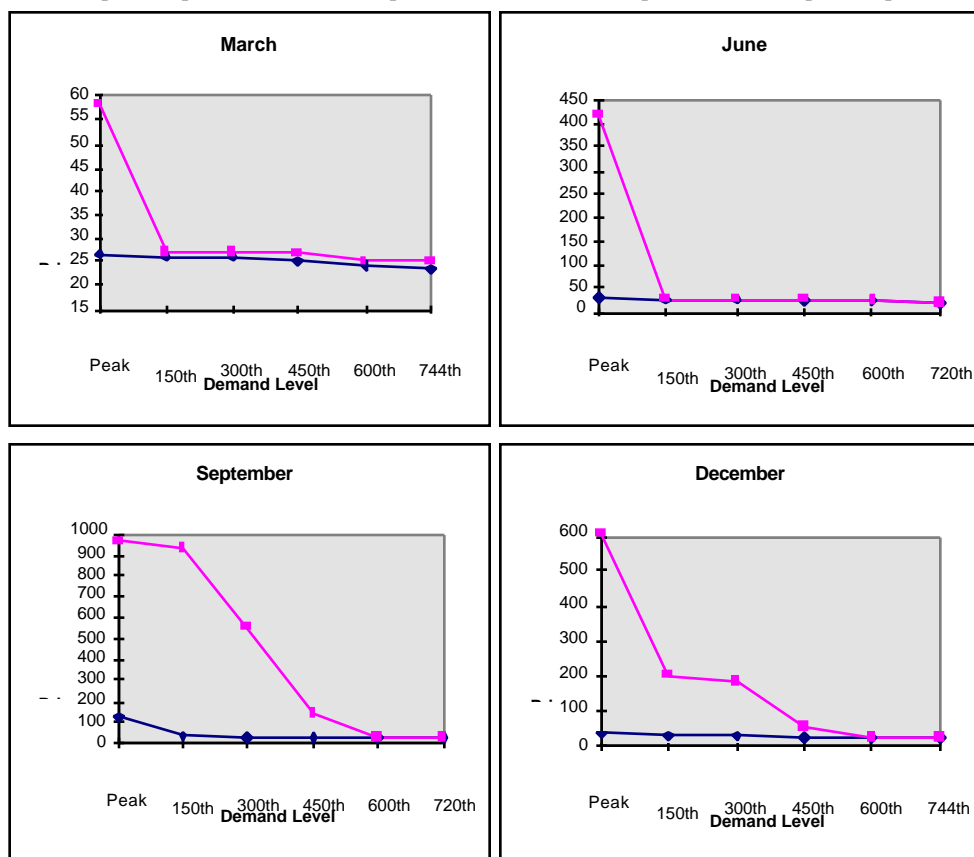
<sup>24</sup> March and December have 31 days or 744 hours. June and September have 30 days, so the bottom category is the 720th hour for these months..

month. As a benchmark, we also calculate the price that would result if all firms acted as competitive price takers.

The scenarios we have model include a base case that reflects the status quo in the ownership and capacity of resources, and two possible sets of divestitures of gas-fired capacity by PG&E and SCE. Our scenarios also assume that existing QFs continue to provide power on a must-take basis.

We modeled the base case using price elasticities of demand equal to 0.1, 0.4, and 1.0. The results of these simulations are presented in detail in the appendix. Figures 3-5 summarize the Cournot equilibrium and competitive market price for the selected hours of each month that were simulated. The elasticity values did not have a significant effect on the difference between the Cournot and competitive equilibrium price during relatively low-demand hours, such as the off-peak hours in June, September, and December, and all of March. However, the Cournot equilibrium price in certain peak hours, such as the three highest demand levels in September were very sensitive to the demand elasticity. These hours reflect demand levels for which most of the competitive fringe is supplying at or near its capacity, meaning that the price-sensitivity of demand plays a relatively greater role in determining the degree to which the Cournot price will deviate from the competitive level.

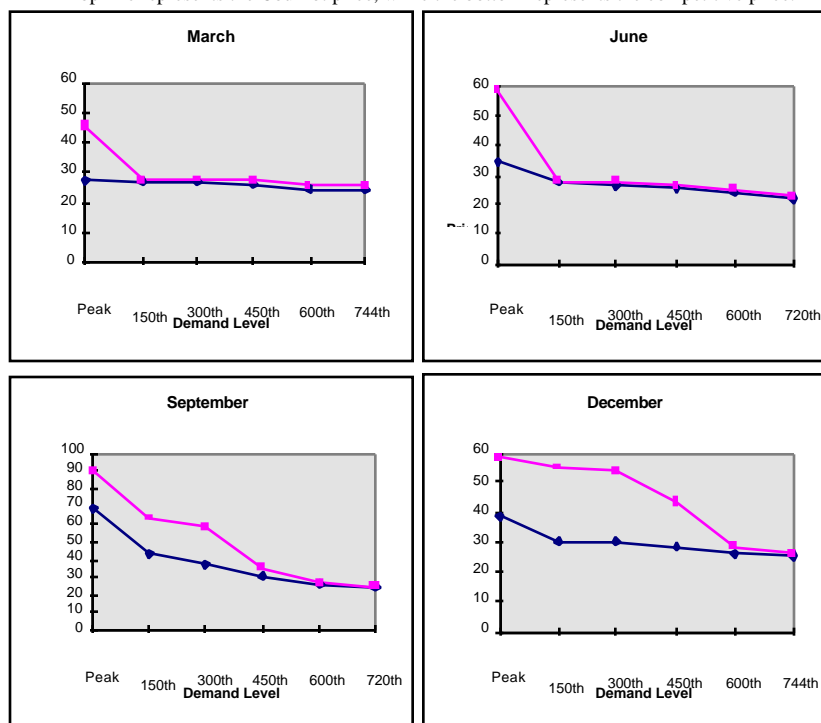
Top line represents the Cournot price, while the bottom represents the competitive price.



*Please note the differences in scale.*

**Figure 3: Market outcomes for base case with elasticity = 0.1**

Top line represents the Cournot price, while the bottom represents the competitive price.



Please note the differences in scale.

Figure 4: Market outcomes for base case with elasticity = 0.4

Top line represents the Cournot price, while the bottom represents the competitive price.

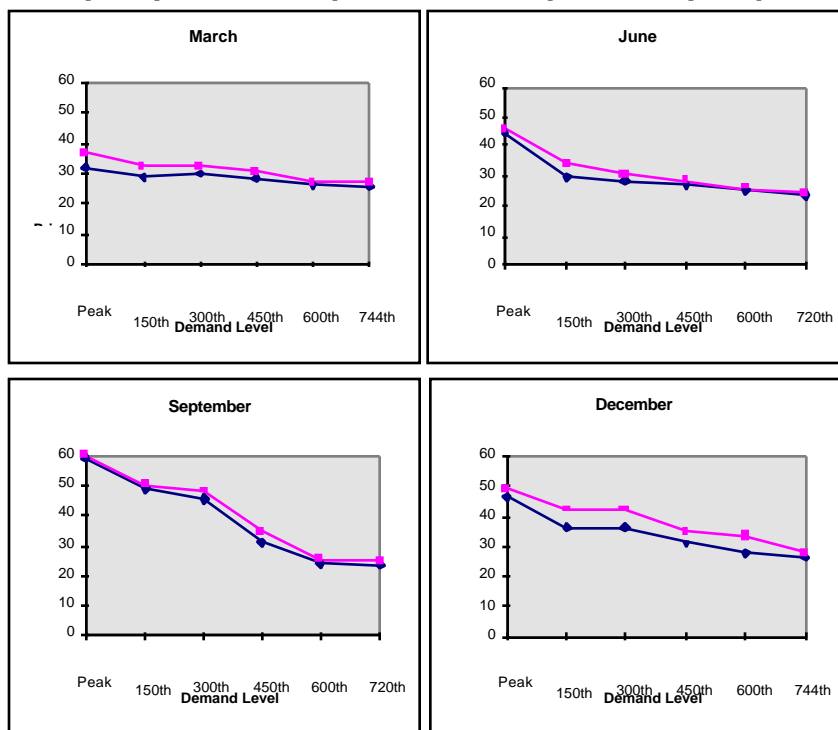


Figure 5: Market outcomes for base case with elasticity = 1.0

The Cournot equilibrium price for the modeled demand hours for each of the three demand elasticity levels examined are presented in Tables 9-11 in appendix A. The reader may note that in many hours the Cournot equilibrium price is *increasing* with demand elasticity rather than decreasing. In fact, the competitive market price also rises with the assumed elasticity. This results from the fact that all demand functions are “anchored” at the forecast demand levels given a forecast price of 9.3¢/kwh (after subtracting off distribution costs), *i.e.*, all demand functions cross at that price. At any lower price, a more elastic demand curve will therefore be to the right of the a less elastic demand curve.



For sufficiently high prices, those above the “anchor” price, less elastic demand is associated with higher Cournot and competitive equilibrium prices. To analyze the exercise of market power, it is perhaps most useful to examine the percent markup over the competitive price that occurs in the Cournot equilibrium. These values are presented in Table 4.

**Table 4: Percent markup over competitive price for selected hours of the base case**

Demand Level	Markup Over Competitive Price at Cournot Equilibrium (%)					
	March			September		
	0.1	0.4	1.0	0.1	0.4	1.0
<b>Peak</b>	119	65	15	*	31	1
<b>150th highest</b>	6	1	11	2647	45	4
<b>300th highest</b>	6	3	7	1630	58	5
<b>450th highest</b>	7	5	8	420	73	18
<b>600th highest</b>	5	4	3	4	6	4
<b>720/744th highest</b>	7	4	6	5	3	5

\* Price in this hour exceeded the maximum price allowed by our simulation

#### 4.1 Divestiture of gas-fired generation

PG&E has proposed the divestiture of roughly half of its gas-fired capacity and SCE has filed a plan to divest all of its gas-fired generation in four roughly equal size lots. Edison

has stated that its affiliates will not bid on that generation and proposes that no single firm be allowed to buy more than 2 of the 4 generation sets.

We examine two possible divestiture options. These represent the two extreme possibilities given the amount to be divested. The first option spins off the units each company has identified for divestiture into three firms, one firm owning the former PG&E units and two firms each owning two of the four sets of SCE's gas units. We assume that these firms act as Cournot players. The second option places all of the divested units into the competitive fringe. This is equivalent to assuming that the generation stations would be spun off to enough different owners that none of these new owners would act strategically. The effect of each of these divestiture options for September on the Cournot equilibrium price is shown in Table 5.

**Table 5: Effects of divestiture options on equilibrium price**

Demand Level	September Energy Price at Cournot Equilibrium (\$/Mwh)							
	Demand Elasticity = 0.1				Demand Elasticity = 0.4			
	Perfect Comp.	No Divest	Divest to Cournot	Divest to Fringe	Perfect Comp.	No Divest	Divest to Cournot	Divest to Fringe
Peak	<b>124.88</b>	<b>959.98*</b>	<b>427.83</b>	<b>365.88</b>	<b>68.62</b>	<b>89.60</b>	<b>69.34</b>	<b>69.34</b>
150th highest	<b>33.93</b>	<b>932.18</b>	<b>159.13</b>	<b>58.17</b>	<b>43.44</b>	<b>63.08</b>	<b>52.36</b>	<b>49.52</b>
300th highest	<b>32.09</b>	<b>555.08</b>	<b>121.20</b>	<b>51.35</b>	<b>36.71</b>	<b>58.17</b>	<b>46.72</b>	<b>51.35</b>
450th highest	<b>26.78</b>	<b>139.15</b>	<b>28.05</b>	<b>27.05</b>	<b>28.20</b>	<b>48.88</b>	<b>31.55</b>	<b>27.05</b>
600th highest	<b>24.37</b>	<b>25.42</b>	<b>25.18</b>	<b>24.38</b>	<b>25.43</b>	<b>27.00</b>	<b>25.42</b>	<b>24.38</b>
720/744 highest	<b>23.89</b>	<b>25.18</b>	<b>24.20</b>	<b>23.88</b>	<b>24.34</b>	<b>25.18</b>	<b>25.18</b>	<b>23.88</b>

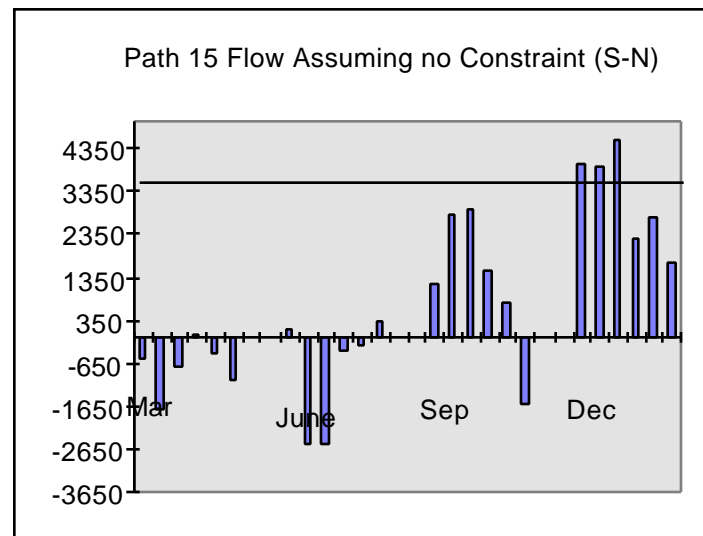
\* This figure is the maximum price allowed by our simulation - equilibrium price could be much higher

The change in peak price in comparison to the base case is significant, even when the units are divested to Cournot firms. The highest peak price is half the equilibrium price before divestiture. Once again, the benefits of more price responsive demand are apparent, as peak prices are 5 to 6 times higher when demand elasticity is 0.1 as opposed to 0.4. A second observation of these outcomes is the lower prices that result in some mid-demand levels when the units are divested into small fringe firms rather than Cournot firms. Unless there is evidence of significant scale economies in the operation of many plants (no such economies are assumed here), it seems that prices are likely to be lower if divested plants are sold to many different firms.

#### 4.4 Transmission flows within California

The results presented up to this point assume that there are no binding transmission constraints inside of California that would create geographic sub-markets within the State. The major transmission path constraint in California is the Path 15 constraint separating northern and southern California. Pacific Gas & Electric has both load and resources on both sides of this transmission path. For our Cournot divestiture case, assuming an elasticity of 0.1, we calculate the supply and demand in the northern and southern

California regions. We can estimate the net flow over the Path 15 demarcation, in the absence of a binding constraint on that path, to be the difference between supply and demand between regions. We also recognize that flows from the Northwest region into each part of California could be reallocated to relieve possible congestion of Path 15. The results of this calculation are illustrated in Figure 6 for the case with the PG&E and SCE gas units divested to three new Cournot firms.



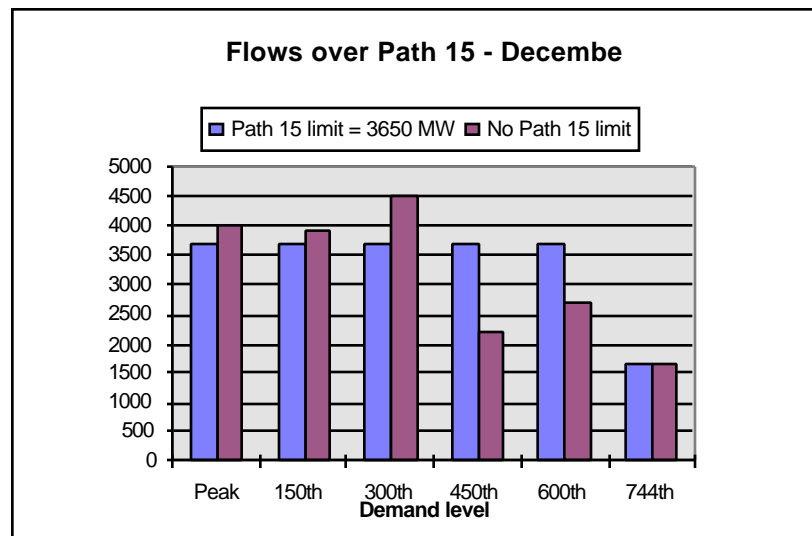
**Figure 6: Flows over Path 15 assuming no constraint - market with divestiture**

It is crucial to understand that the flows that would result from a Cournot equilibrium where the competitors assume there will be no in-state congestion (as is shown in Figure 6) are not the same as the potential congestion that would arise if strategic players explicitly account for potential in-state congestion in their output decisions.<sup>25</sup> A Cournot player in a specific region, knowing that potential imports into that region would be limited by transmission constraints, may very well reduce its output below the level of output it would choose if there were no limits on transmission capacity. This is similar to the strategic response that Cournot players will exhibit with respect to non-California imports. We now examine this behavior when in-state producers explicitly account for the Path 15 constraint.

The constraint of concern is south-to-north flow over the Path 15 demarcation. The actual flow limits over this path vary with supply and load conditions, but we use an estimate of 3650 MW for the maximum flows over this path. This is roughly the midpoint of the range identified by Pace (1996). In periods when there is little hydro energy available, both northern California and the Pacific Northwest import power from the south. Thus,

<sup>25</sup> Borenstein et.al. (1996b) present a thorough analysis of the incentives of a firm to permit congestion of a transmission line into its region and then optimize along the resulting residual demand function.

the periods in which the flows over Path 15 may reach their limits are likely to coincide with periods in which there is very little competitive generation available for export in the pacific northwest. We examine the northern California market for the months of September and December under the assumption that the flows to the north over Path 15 were at their maximum. To determine whether this congestion would in fact arise, we compared the operating profits of the dominant firm (in this case PG&E) under the assumption of no Path 15 congestion with the profits of that firm if it chose to restrict its own output to the point that the path is congested.



**Figure 7: Strategic Effects of Path 15 Constraints - Cournot Divestiture**

From these results, we find that the dominant firm in the north would prefer to reduce output and congest Path 15 in three hours of September and all but the most off-peak demand hour in December. Note that if PG&E was not taking the Path 15 constraint explicitly into consideration, Path 15 flows would exceed their limit in only one hour of September, as shown in Figure 6. Thus PG&E, knowing that competitive capacity will be limited by the Path 15 constraint, would find it more profitable to reduce output further and congest that path. In several of the highest demand hours of this month, demand cannot be met by the combined capacity of northern California municipal utilities, QFs and the divested PG&E even after accounting for imports of 3650 MW over Path 15. PG&E can therefore act monopolist on the residual demand in these hours units.

This comparison still is not sufficient to determine conclusively whether the Path 15 constraint would be binding when it is incorporated into a firm's output decision. The profit comparison of PG&E indicates when that firm would want the path to be congested, but we need to determine whether firms in the south would be willing to congest it. To do this, we examine the southern California market under the assumption that there will be an aggregate outflow of 3650 MW over Path 15 to northern California. This was accomplished by adding 3650 MW to the native demand in the south. In order for there to be congestion on Path 15 in equilibrium, we must find that the price in

southern California is lower than the price in northern California.<sup>26</sup> As Table 6 indicates, this is indeed the case for the hours in which PG&E finds it profitable to reduce its output and congest Path 15. Note that in several hours prices in *both* northern and southern California are higher than they would have been if the path 15 constraint did not exist.

**Table 6: Price Impacts of Path 15 Congestion (with path limit = 3650 MW)**

Demand Level	Peak	150th highest	300th highest	450th highest	600th highest	744th highest
<b><u>September</u></b>						
North Cal. Equilibrium Price (\$/Mwh)	427.83	931.36	410.07	125.79	25.18	24.2
South Cal. Equilibrium Price (\$/Mwh)	427.83	305.95	234.83	58.35	25.18	24.2
Path 15 Flows (South to North)	1211	3650	3650	3650	1479	-1571
<b><u>December</u></b>						
North Cal. Equilibrium Price (\$/Mwh)	<b>959.98*</b>	667.93	403.96	135.97	29.74	25.42
South Cal. Equilibrium Price (\$/Mwh)	151.87	32.38	54.93	28.18	27.83	25.42
Path 15 Flows (South to North)	3650	3650	3650	3650	3650	1687

\* This value is the maximum price allowed by our simulation - equilibrium price could be much higher. An examination of the same comparisons when demand elasticity is 0.4 indicates that congestion over this path is reduced when demand is more price responsive. Profits for PG&E are greater in every hour of September when flows over Path 15 are not at their maximum, indicating that PG&E would prefer to not congest the path in those hours. The Path 15 constraint, however, is still binding in most hours of December.

#### 4.5 Sensitivity of Results to Hydroelectric Production

The results presented in previous sections assume that the hydro energy available in each month modeled is equal to the average (for that month) of the actual production over the last four years. There is significant variation in hydro production from year to year. To investigate the impact of varying water levels on market power, we also calculate the Cournot equilibrium for the basecase and the Cournot divestiture case using the actual

<sup>26</sup> It is important to note that our representation of the transmission grid is a radial network of the lines connecting California with its neighboring States. In a meshed network, one might see price differences between regions even though the lines connecting those regions are not congested. Further, it is possible in a meshed network that, along a congested path, power may flow from a high cost region to a lower cost region see (Wu, et al., 1996).

hydro levels during 1995-1996.<sup>27</sup> Hydro-electric production in 1995-96 was significantly higher than the four year average.

As can be seen in Table 7 and Table 8, the additional hydro energy produces a significant impact on market power. In several hours of December, the increased hydro output lowered basecase prices to approximately the same levels produced by the divestitures

**Table 7: Effect of increased hydro production on basecase prices**

Demand Level	Basecase Energy Price at Cournot Equilibrium - Elasticity = .1 (\$/Mwh)							
	September				December			
	Average Hydro		95-96 Hydro		Average Hydro		95-96 Hydro	
	Perfect Compet.	Cournot	Perfect Compet.	Cournot	Perfect Compet.	Cournot	Perfect Compet.	Cournot
Peak	<b>124.88</b>	<b>959.98</b>	<b>91.95</b>	<b>959.98</b>	<b>34.01</b>	<b>603.61</b>	<b>26.62</b>	<b>210.12</b>
150th highest	<b>33.93</b>	<b>932.18</b>	<b>28.20</b>	<b>290.83</b>	<b>28.73</b>	<b>205.03</b>	<b>27.91</b>	<b>58.35</b>
300th highest	<b>32.09</b>	<b>555.08</b>	<b>29.08</b>	<b>304.96</b>	<b>28.82</b>	<b>184.40</b>	<b>27.93</b>	<b>54.93</b>
450th highest	<b>26.78</b>	<b>54.93</b>	<b>26.78</b>	<b>58.35</b>	<b>25.59</b>	<b>54.93</b>	<b>26.21</b>	<b>27.90</b>
600th highest	<b>24.37</b>	<b>25.42</b>	<b>24.37</b>	<b>25.42</b>	<b>25.76</b>	<b>28.06</b>	<b>25.43</b>	<b>27.04</b>
720/744 highest	<b>23.89</b>	<b>25.18</b>	<b>23.98</b>	<b>25.18</b>	<b>25.16</b>	<b>25.42</b>	<b>24.76</b>	<b>25.18</b>

under the average hydro conditions. Most of these benefits arise from the additional competitive resources in the pacific northwest that are available for export into California. These results indicate that the frequency and severity of market power will be significantly muted in years of above average hydro conditions.

**Table 8: Effect of increased hydro production on Cournot divestiture prices**

Demand Level	Divestiture Energy Price at Cournot Equilibrium - Elasticity = .1 (\$/Mwh)							
	September				December			
	Average Hydro		95-96 Hydro		Average Hydro		95-96 Hydro	
	Perfect Compet.	Cournot	Perfect Compet.	Cournot	Perfect Compet.	Cournot	Perfect Compet.	Cournot
Peak	<b>124.88</b>	<b>427.83</b>	<b>91.95</b>	<b>337.96</b>	<b>34.01</b>	<b>129.62</b>	<b>26.62</b>	<b>58.35</b>
150th highest	<b>33.93</b>	<b>159.13</b>	<b>28.20</b>	<b>58.17</b>	<b>28.73</b>	<b>54.93</b>	<b>27.91</b>	<b>28.18</b>
300th highest	<b>32.09</b>	<b>121.20</b>	<b>29.08</b>	<b>58.35</b>	<b>28.82</b>	<b>54.93</b>	<b>27.93</b>	<b>28.01</b>
450th highest	<b>26.78</b>	<b>28.05</b>	<b>26.78</b>	<b>27.90</b>	<b>25.59</b>	<b>28.13</b>	<b>26.21</b>	<b>27.83</b>
600th highest	<b>24.37</b>	<b>25.18</b>	<b>24.37</b>	<b>25.18</b>	<b>25.76</b>	<b>27.04</b>	<b>25.43</b>	<b>25.99</b>
720/744 highest	<b>23.89</b>	<b>24.20</b>	<b>23.98</b>	<b>24.20</b>	<b>25.16</b>	<b>25.42</b>	<b>24.76</b>	<b>25.18</b>

## 4.6 Intertemporal Scheduling Issues

<sup>27</sup> The figures used were actual hydro-electric production in the months of December, 1995, and March, June, and September 1996.

As we have noted above, two issues of intertemporal generation scheduling are not fully incorporated into this study. First, the scheduling of hydro production is assumed to simply shave peaks in quantity demanded rather than fully maximize profits by equalizing the producer's marginal revenue of hydro production across periods. To explore the sensitivity of our results to this treatment of hydro, we investigated one scenario in more detail. For the divestiture (to Cournot) scenario with a demand elasticity of 0.4 in the month of September, we attempted to iteratively reallocate PG&E's hydro production to equalize its marginal revenue across periods. The results indicate that, at least in this one case, the optimal hydro scheduling involves significantly different allocation of hydro production than is implied by the peak-shaving algorithm. The equilibrium prices, however, are very little changed by this reallocation of hydro. As PG&E's hydro is moved out of one period, for instance, the market price rises and substantial output from other large producers and the competitive fringe results. Thus, although, a more sophisticated treatment of hydro scheduling is likely to yield more accurate predictions of hydro use, and could significantly affect the forecasts of hydro production, it may not have much effect on the forecasts of price/marginal cost differences.

There is also the likelihood that hydro energy provided by the fringe will shift from off-peak hours to higher demand hours in response to the higher prices resulting in those hours in the Cournot equilibria. This would reduce the market power effect in those hours. We note, however, that market power is most severe when there is little spare hydro energy available, so the impact of this effect may not be significant. The dynamic interaction of both strategic and fringe hydro producers is an important topic for future study.

The second intertemporal scheduling issue that is not incorporated in this analysis is unit commitment. In modeling each hour independently of the others, we do not account for the various intertemporal constraints on thermal units such as start-up costs, minimum up and down times, and ramping rates. While we view considerations of these constraints as an important extension of oligopoly models in the electricity industry that merits further study, we can draw some qualitative conclusions here about the effects of such constraints.

In general, the linking of adjacent hours in the output decisions of Cournot players will tend to reduce their output further in peak hours while increasing in the off-peak hours. In setting output levels in peak hours, firms will have to consider the possibility that certain units deployed for those peak hours could not be shut down in intervening off-peak hours. Thus, that firm may choose not to operate any units with marginal costs near the firm's marginal revenue in the absence of intertemporal constraints. Similarly, some units for whom intertemporal constraints are binding will still be operated on-peak. Those units would have to be operated at some level in off-peak hours, effectively lowering firm's

marginal costs in those hours and increasing output over the levels indicated when intertemporal constraints are not considered.

#### 4.7 Integrated Regional Markets

The results presented above have focused on the California electricity market. Markets in the regions outside of California have been considered only to the extent of their ability to export power *into* California. As such, we do not examine the impact of exports *from* producers in California. In general, we expect that including the possibilities of exports from California would not decrease prices in California, since any additional production would not be consumed locally.

There are several other aspects of the integrated regional market that deserve further analysis. When we examine Path 15 flows, we account only for exports out of southern California into northern California. In addition it is common for power to flow from the south to the pacific northwest in low hydro months. Explicitly accounting for these exports may add additional congestion over this path. We also schedule the hydro resources in each region according only to that region's demand profile. When the demand, and market prices, of combined regions is considered, we would expect the hydro allocations to differ somewhat. To the extent that we treated all out-of-state hydro resources as fringe suppliers, any adjustments to market outcomes inside California would serve to reduce the impact of market power. Once again, it is difficult to estimate the impact of such a response without modeling the combined markets.

We also do not consider any potential strategic behavior of players outside of California. Among other effects, strategic behavior by non-California firms would mute (or even reverse) the impact of optimal hydro scheduling on market power. The federally owned Bonneville Power Administration (BPA) controls the largest generation capacity of any electricity supplier in the WSCC, most of it hydroelectric. Since it is a public agency, we have until now assumed that it would not act strategically when setting its output levels. However, to examine the potential impact of strategic behavior on the part of BPA on the California/northwest markets, we did simulate seven high demand hours of September in the context of divestiture (to Cournot) and a demand elasticity of 0.4, but made two adjustments to the previous analysis. First, we merged the California and Northwest markets to examine the potential impact of a change in BPA's behavior on both markets. Second, since under our assumptions, customers in the Northwest would not receive varying price signals, we treat the Northwest demand as inelastic, and shift the California demand curve rightward by the corresponding amount of Northwest demand to form an aggregate demand for the merged markets.

The results of this exercise indicated that BPA would continue its high level of hydro output, but in most hours choose not to operate its thermal plants. This indicates that BPA's marginal revenue falls somewhere between zero and the marginal cost of its least

expensive thermal plant. Prices in this combined market rose somewhat, but not by a large amount. Thus even though BPA controls a huge resource mix, since most of those resources have zero short-run marginal cost, a strategic BPA would still produce significant output since its operating margins are so great on those resources.

## 5. Conclusions

The restructured California electricity generation market may have a few large producers that could potentially find it profitable to restrict output to raise price. Previous attempts to estimate the risk of market power have relied on concentration measures. These measures fail to account for demand or supply elasticities of producers. They are a rough approximation that are best used only when better data are not available. In this case, better data are available. We use historical data on plant costs and capacities to simulate the competitive market for electricity following restructuring. The simulation recognizes that large firms might have an incentive to restrict output to raise price. We are able to explicitly analyze each firm's incentive to do this.

While the approach that we employ accounts for demand and supply elasticities and for the incentive of firms to restrict output, it does not explicitly consider the effects of market entry and exit. We suggest that these considerations – as well as recognition that consumers are able to adjust to prices more completely over longer periods – argue for consideration of simulations using demand functions that are more price-elastic than most short-run estimates. Otherwise, the model is likely to forecast greater exercise of market power than will actually occur. Our approach also does not account for the possibility that firms engaged in repeated interactions with one another may compete less aggressively over time. This could cause the model to forecast less exercise of market power than will actually occur. Unfortunately, economic models of such dynamic interaction are notoriously complex and the results usually indeterminate, offering virtually no guidance for empirical implementation. The simulation model we use takes explicit account of the capacities of thermal plants, the intertemporal and instantaneous constraints on hydroelectric generation, the flow constraints on transmission lines, the native-load requirements of out-of-state producers that may sell into the California market, reserve requirements, special must-run status of nuclear plants, the must-take status of some QFs.

We simulate the California market in the year 2001. We use that year because it is probably the earliest date at which the market will not be significantly distorted by transition charges and guaranteed prices. The Cournot model indicates that, under the current industry structure, there is the potential for market power in several high demand hours of several months of the year. Divestiture of all Edison thermal plants and half of PG&E's thermal plants, as has been proposed, would substantially lessen market power, we find. Perhaps the greatest impact on the severity of market power comes from increased price responsiveness in the market. In the hours in which the potential for market power exists, the impact of market power on prices is significantly reduced when the elasticity of demand is increased from the current short-run estimates of around 0.1. It is important for policy makers to recognize that elasticities of both supply and demand are not exogenous variables. Our results indicate that policies that promote the responsiveness of both consumers and producers of electricity to short-run price fluctuations can have a significant effect on reducing the market power problem. Such policies may be more rewarding, and less contentious, than other approaches that attempt to regulate prices under various conditions.

The results of our analysis indicate that there is a significant possibility that some firms will be able to exercise market power at certain hours of the year. While this makes deregulation of generation less attractive than if there were no possibility of market power, this finding should not be seen as suggesting that deregulation is a mistake. Very few markets are completely devoid of market power. One must compare the prices consumers will face in a deregulated market with the outcome under the current regime or some other baseline. While the techniques we employ here could be used to address this questions, it would require a more detail hour-by-hour analysis of this market than we have thus far carried out.

## Appendix A - Simulation Results

**Table 9: Market outcomes for base case with elasticity = 1.0**

Demand Level	Peak	150th highest t	300th highest t	450th highest t	600th highest t	744th highest t
<u>March</u>						
Competitive Price (\$/Mwh)	31.64	28.91	29.88	28.19	26.18	25.53
Cournot Equilibrium Price (\$/Mwh)	36.35	32.07	32.07	30.34	27	27
Market Quantity	49111	48691	45783	39972	35361	35361
<u>June</u>						
Competitive Price (\$/Mwh)	44	29.75	28.69	27.46	25.25	23.47
Cournot Equilibrium Price (\$/Mwh)	45.97	33.85	30.54	28.17	26.15	24.3
Market Quantity	56792	52065	48120	42254	36684	30501
<u>September</u>						
Competitive Price (\$/Mwh)	59.77	48.8	45.5	32.84	24.37	23.89
Cournot Equilibrium Price (\$/Mwh)	60.55	50.72	47.9	38.84	25.42	25.18
Market Quantity	53060	45638	42975	41414	30327	30338
<u>December</u>						
Competitive Price (\$/Mwh)	46.49	36.14	36.2	30.57	28.19	26.18
Cournot Equilibrium Price (\$/Mwh)	48.89	41.91	42.12	34.47	33.27	28.06
Market Quantity	45992	43559	41028	39539	34586	32162

**Table 10: Market outcomes for base case with elasticity = 0.1**

Demand Level	Peak	150th highest t	300th highest t	450th highest t	600th highest t	744th highest t
<u>March</u>						
Competitive Price (\$/Mwh)	26.69	25.95	25.95	25.25	23.97	23.47
Cournot Equilibrium Price (\$/Mwh)	58.35	27.45	27.45	27	25.18	25.18
Market Quantity	40092	38965	36637	31242	26397	26398
<u>June</u>						
Competitive Price (\$/Mwh)	30.44	26.18	25.23	24.41	23.16	20.84
Cournot Equilibrium Price (\$/Mwh)	419.94	27.45	26.24	25.42	24.2	20.83
Market Quantity	44920	42694	37758	32081	27078	22003
<u>September</u>						
Competitive Price (\$/Mwh)	124.88	33.93	32.09	26.78	24.37	23.89
Cournot Equilibrium Price	959.98*	932.18	555.08	139.15	25.42	25.18

(\$/Mwh)	*					
<b>Market Quantity</b>	45239	35206	33737	32880	30327	30338
<b><u>December</u></b>						
<b>Competitive Price (\$/Mwh)</b>	34.01	28.73	28.82	26.12	25.76	25.16
<b>Cournot Equilibrium Price (\$/Mwh)</b>	603.61	205.03	184.4	54.93	28.06	25.42
<b>Market Quantity</b>	36734	34822	33174	31596	28113	24380

\* This value is the maximum price allowed by our simulation - equilibrium price could be much higher

**Table 11: Market outcomes for base case with elasticity = 0.4**

Demand Level	Peak	150th highest	300th highest	450th highest	600th highest	744th highest
<b><u>March</u></b>						
<b>Competitive Price (\$/Mwh)</b>	27.5	27.06	27.01	26.18	24.37	24.21
<b>Cournot Equilibrium Price (\$/Mwh)</b>	45.29	27.46	27.9	27.45	25.42	25.18
<b>Market Quantity</b>	41738	42905	40236	34377	29324	29368
<b><u>June</u></b>						
<b>Competitive Price (\$/Mwh)</b>	34.74	27.3	26.18	25.43	23.89	22.18
<b>Cournot Equilibrium Price (\$/Mwh)</b>	58.17	27.9	27.9	26.24	25.18	22.46
<b>Market Quantity</b>	51376	46888	41394	35474	30079	24729
<b><u>September</u></b>						
<b>Competitive Price (\$/Mwh)</b>	68.62	43.44	36.71	28.2	25.43	24.34
<b>Cournot Equilibrium Price (\$/Mwh)</b>	89.6	63.08	58.17	48.88	27	25.18
<b>Market Quantity</b>	50236	42724	39748	35750	33382	33753
<b><u>December</u></b>						
<b>Competitive Price (\$/Mwh)</b>	38.49	30.25	30.42	26.82	26.18	25.43
<b>Cournot Equilibrium Price (\$/Mwh)</b>	58.35	54.93	53.99	43.31	28.13	25.99
<b>Market Quantity</b>	42986	38050	36075	33086	30862	27000

**Table 12: Divestiture to Three Cournot Firms, elasticity = 0.1**

Demand Level	Peak	150th highest	300th highest	450th highest	600th highest	744th highest
<b><u>March</u></b>						
<b>Competitive Price (\$/Mwh)</b>	26.69	25.95	25.95	25.25	23.97	23.47
<b>Cournot Equilibrium Price (\$/Mwh)</b>	27.45	27	27	25.42	25.18	24.2
<b>Market Quantity</b>	38128	35554	33545	28017	24819	25549
<b><u>June</u></b>						
<b>Competitive Price (\$/Mwh)</b>	30.44	26.18	25.23	24.41	23.16	20.84
<b>Cournot Equilibrium Price (\$/Mwh)</b>	64.19	27	25.42	25.18	24.2	20.83
<b>Market Quantity</b>	51906	42723	37805	32092	27079	22003
<b><u>September</u></b>						
<b>Competitive Price (\$/Mwh)</b>	124.88	33.93	32.09	26.78	24.37	23.89

<b>Cournot Equilibrium Price (\$/Mwh)</b>	427.83	159.13	121.2	28.05	25.18	24.2
<b>Market Quantity</b>	48810	41255	38444	36223	30337	30384
<b><u>December</u></b>						
<b>Competitive Price (\$/Mwh)</b>	34.01	28.73	28.82	26.12	25.76	25.16
<b>Cournot Equilibrium Price (\$/Mwh)</b>	129.62	54.93	54.93	29.02	27.04	25.42
<b>Market Quantity</b>	41394	38286	36155	32619	28156	24381

**Table 13: Divestiture to Three Cournot Firms, elasticity = 0.4**

<b>Demand Level</b>	<b>Peak</b>	<b>150th highest</b>	<b>300th highest</b>	<b>450th highest</b>	<b>600th highest</b>	<b>744th highest</b>
<b><u>March</u></b>						
<b>Competitive Price (\$/Mwh)</b>	27.5	27.06	27.01	26.18	24.37	24.21
<b>Cournot Equilibrium Price (\$/Mwh)</b>	28.17	27.46	27.9	27	25.18	25.18
<b>Market Quantity</b>	42185	38942	36900	31161	26658	27635
<b><u>June</u></b>						
<b>Competitive Price (\$/Mwh)</b>	34.74	27.3	26.18	25.43	23.89	22.18
<b>Cournot Equilibrium Price (\$/Mwh)</b>	45.97	27.46	27	26.07	24.2	22.17
<b>Market Quantity</b>	54176	47010	41616	35511	30263	24775
<b><u>September</u></b>						
<b>Competitive Price (\$/Mwh)</b>	68.62	43.44	36.71	28.2	25.43	24.34
<b>Cournot Equilibrium Price (\$/Mwh)</b>	69.34	52.36	46.72	31.55	25.42	25.18
<b>Market Quantity</b>	53771	44642	41770	38991	33703	33751
<b><u>December</u></b>						
<b>Competitive Price (\$/Mwh)</b>	38.49	30.25	30.42	26.82	26.18	25.43
<b>Cournot Equilibrium Price (\$/Mwh)</b>	48.92	33.68	33.68	29.02	27.83	25.42
<b>Market Quantity</b>	44755	42109	39765	35672	30916	27094

**Table 14: Divestiture to Fringe Firms, elasticity = 0.1**

<b>Demand Level</b>	<b>Peak</b>	<b>150th highest</b>	<b>300th highest</b>	<b>450th highest</b>	<b>600th highest</b>	<b>744th highest</b>
<b><u>March</u></b>						
<b>Competitive Price (\$/Mwh)</b>	26.69	25.95	25.95	25.95	23.97	23.47
<b>Cournot Equilibrium Price (\$/Mwh)</b>	27.45	26.63	26.15	26.15	24.06	23.85
<b>Market Quantity</b>	37646	35520	33215	33215	24115	24631
<b><u>June</u></b>						
<b>Competitive Price (\$/Mwh)</b>	30.44	26.18	25.23	24.41	23.37	20.84
<b>Cournot Equilibrium Price (\$/Mwh)</b>	51.35	26.24	25.42	24.91	23.46	20.83
<b>Market Quantity</b>	52593	42771	37805	32105	27110	22003
<b><u>September</u></b>						
<b>Competitive Price (\$/Mwh)</b>	124.88	33.93	32.09	26.78	24.37	23.89
<b>Cournot Equilibrium Price (\$/Mwh)</b>	365.88	58.17	51.35	27.05	24.38	23.88

(\$/Mwh)						
<b>Market Quantity</b>	49508	44279	40692	36276	30375	30399
<b><u>December</u></b>						
<b>Competitive Price (\$/Mwh)</b>	34.01	28.73	28.82	26.12	25.76	25.16
<b>Cournot Equilibrium Price (\$/Mwh)</b>	51.35	29.28	28.9	26.11	25.85	25.18
<b>Market Quantity</b>	44038	39511	37331	32761	28207	24389

**Table 15: Divestiture to Fringe Firms, elasticity = 0.4**

<b>Demand Level</b>	<b>Peak</b>	<b>150th highest</b>	<b>300th highest</b>	<b>450th highest</b>	<b>600th highest</b>	<b>744th highest</b>
<b><u>March</u></b>						
<b>Competitive Price (\$/Mwh)</b>	27.5	27.06	27.01	27.01	24.37	24.21
<b>Cournot Equilibrium Price (\$/Mwh)</b>	27.9	27.45	27.45	27.45	24.38	24.3
<b>Market Quantity</b>	41735	38918	36356	36356	26186	26516
<b><u>June</u></b>						
<b>Competitive Price (\$/Mwh)</b>	34.74	27.3	26.18	25.43	24.11	22.18
<b>Cournot Equilibrium Price (\$/Mwh)</b>	43.52	27.45	26.63	25.42	24.1	22.17
<b>Market Quantity</b>	54806	47013	41706	35652	30282	24775
<b><u>September</u></b>						
<b>Competitive Price (\$/Mwh)</b>	68.62	43.44	32.09	26.78	24.37	23.89
<b>Cournot Equilibrium Price (\$/Mwh)</b>	69.34	49.52	51.35	27.05	24.38	23.88
<b>Market Quantity</b>	53771	45204	40692	36276	30375	30399
<b><u>December</u></b>						
<b>Competitive Price (\$/Mwh)</b>	38.49	30.25	30.42	26.82	26.18	25.43
<b>Cournot Equilibrium Price (\$/Mwh)</b>	44.44	32.38	31.83	27.81	26.17	25.63
<b>Market Quantity</b>	45690	42411	40173	35926	31224	27059

## Appendix B- Data Sources

### Thermal Generating Plant Data

Costs of thermal generating plants were derived using the inputs from General Electric's MAPS multi-area production cost simulation model obtained from CEC staff. Plant status and capacities were cross checked with the Energy Information Administration's 1994 Inventory of US Generating plants (DOE/EIA, 1995) for plants not owned by California utilities. Generation plants owned by California utilities were also cross checked with plant capacities in appendix A of the CEC's 1994 electricity report (ER94). "Available" plant capacities were derived using the plants rated capacity multiplied by its average forced outage rate. Forced outage rates were taken from the MAPS inputs and, for California owned plants, crossed checked with FORs provided in ER94. As explained in the text, capacities are not adjusted for maintenance requirements, because the timing of such unavailability is a strategic decision of the firm.

Thermal plant operating costs were derived using the full capacity average heat rates from MAPS, and fuel cost projections used by Deb, et. al. (1996) which were derived from ER94 and other sources. To these fuel costs we added variable operating and maintenance costs taken from the MAPS data set. There is, however, a disturbing amount of variance between data sets about the capabilities and costs of plants in some regions. Fortunately, the larger source of information available for California owned facilities is much more consistent across data sets.

**Table 16: Delivered Gas Prices (\$/Mcf)**

<i>Period</i>	<i>Northwest</i>	<i>Nor. Cal.</i>	<i>So. Cal.</i>	<i>Rocky Mt. N.</i>	<i>Rocky Mt. - SW</i>
December	2.18	2.50	2.69	2.18	2.50
March, June, Sep	2.04	2.31	2.50	2.04	2.31

**Table 17: Incremental Costs of PG&E and SCE (summer gas prices)**

PG&E			SCE	
<u>Incremental \$/Mwh</u>	<u>Total Capacity</u>	<u>Cum Capacity (GW)**</u>	<u>Total Capacity</u>	<u>Cum Capacity (GW)**</u>
0-4.90	4.26*	4.26	1.128*	1.128
5.00-9.90	0.00	4.26	0	1.128
10.00-14.99	1.90	6.16	2.629	3.757
15.00-19.90	0.00	6.16	0.734	4.491
20.00 - 24.90	4.34	10.50	5.751	10.242
25.00 - 29.90	2.51	13.01	2.208	12.45
30.00 - 34.90	0.05	13.06	1.082	13.532
35.00 - 39.90	0.04	13.11	0	13.532
40.00-44.90	0.00	13.11	0	13.532
45.00-49.90	0.00	13.11	0	13.532
50.00 - 54.90	0.38	13.48	0	13.532
55.00 and up	0.04	13.52	0.132	13.664

\*Includes maximum instantaneous flow capacity of pondage hydro

\*\*thermal unit capacities derated by forced outage rates

### Hydro Generation Data

Hydro plant data were taken from the data set used by Southern California Gas Company in its 1995 performance-based ratemaking simulation studies (Pando, 1995). This data set was also used by Kahn, et. al (1996) in their simulation analysis of the WSCC. The minimum and maximum flow capacities of the hydro resources shown in Table 2 are taken from this data set. Monthly hydro energy production values were primarily derived from the Energy Information Agency's *Electric Power Monthly* (EIA). The values used for U.S. production are four-year averages of the production in each respective month. The production by the Canadian members of the WSCC was taken from the 2001 production forecast given in the WSCC report *Expected Loads and Resources* (WSCC, 1996).

The data provide instantaneous maximum and minimum MW outputs for hydro-systems in the WSCC as well as monthly energy (MWH) quotas for each facility or set of facilities. Hydro facilities fall into three categories - pondage, run-of-river, and pumped storage. Run-of-river capacity is derived from the minimum flow rates of each of these facilities and the respective energy used through run-of-river was deducted from each system's monthly energy quotas. In order to derive the amount of standard pondage capacity that would be available in any given hour, we allocated the remaining monthly energy across the hours of a month in a process known as "peak-shaving." Such an allocation of hydro energy assumes that the highest output will occur in the highest demand hour and respectively less capacity would be available for lower demand hours. As long as the instantaneous flow capacity of hydro facilities were not violated, the peak shaving process would leave a constant level of demand to be served by non-hydro sources over the hours to which pondage hydro generation was applied. If the maximum flow capacity was a binding constraint, the peaks would be shaved as much as possible, but still be left with a higher level of demand than other near-peak hours. Peak-shaving was performed regionally - California hydro energy was applied to aggregate California load shapes, and likewise for the Northwest and Southwest regions. Peak-shaving is an approximation to the marginal revenue equalization that an optimizing firm would actually pursue, as described in the text.

Pump-storage units were assumed to be available in the two highest demand runs and assumed to be unavailable during the four low-demand hours. There were three pumped storage units represented: 1188 MW owned by PG&E, 217 MW owned by SCE, and 1287 MW owned by LADWP. These figures are taken from ER94. Demand in the off-peak hours was adjusted upwards to account for the additional storage into these units. The energy price of the PG&E and LADWP units was set at an estimate of the low-demand energy marginal cost, \$22.50/MWH, and revised upwards to \$27.50/MWH to account for energy losses in the pumping process. Edison was expected to have lower off-

peak marginal costs of around \$15.50/Mwh which was revised upwards to \$20/Mwh to account for pumping losses.

There is currently some level of ambiguity about the control of pondage-hydro resources in California's forthcoming PX. It is assumed that utilities will receive the market price for their hydro-energy, but it is unclear how well coordinated hydro-scheduling will be with the PX and ISO market processes. We use the peak-shaving approach as a first-level approximation to hydro output, one that most likely understates the market power potential of using this energy strategically.

### **Transmission Capacities**

The capacities of the major transmission paths into California were taken from the non-simultaneous path-ratings of the Western Systems Coordinating Council (WSCC, 1996b) and from the most recent SCIT agreements (SCIT, 1996). These included a non-simultaneous capability of 4880 MW from the NW region into northern California, 2900 MW from the NW into southern California, and a total of 11326 MW from Nevada, Utah, and Arizona into Southern California. There are several path constraints that appear to be relevant when considering import capacities into southern California. These are the Southern California Instantaneous Transmission (SCIT) constraint, which includes flows from northern California, and two paths in the desert southwest - the West-of-River constraint of 9406 MW, which includes flows from Nevada, Utah, and Arizona - and the East-of-River constraint, which deals only with flows from Arizona. Because of the aggregation of States that we chose to include in our Southwest region, we used the West-of-River simultaneous import constraint to represent the limit of supply from that region. Transmission capacity into southern California is further augmented by the Intermountain DC link, which has a WSCC rated capacity of 1920 MW into California.

### **Demand Data**

Monthly loads and load shapes were provided from the MAPS data set for a base year of 1995. These load shapes were scaled according to the summer peak forecast for the year 2001 for each region. Annual peaks for the California utilities were taken from ER94. Monthly peaks for each utility was derived by multiplying the annual peak by monthly peak factors derived from the MAPS data. The 2001 demand peak for out-of-state utilities was derived by escalating the 1995 peaks provided by the MAPS data set by the regional summer peak growth forecasts of the WSCC.

### **Qualifying Facilities**

For our base cases, we used ER94 estimate of reliable QF capacity, 8279 MW. The capacity was derated according to the peak and off-peak capacity factor estimates given in Kito (1992). It was assumed that this capacity would be available during all hours. This assumption is consistent with those used in other studies of the California market (See

Kahn et. al. (1996), Joskow et. al. (1996)). It is widely acknowledged that this figure most likely overstates the actual effective capacity of QF generation for two reasons. The ER94 capacity estimate does not consider the fact that the majority of QFs will be receiving considerably lower payments due to the expiration of the fixed energy price period of their contracts.

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